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MEETING MINUTES

TO: Distribution **DATE:** April 26, 1995
FROM: Phil Nixon **DOCUMENT #:** SP307:042695:03
PROJECT: OU4 IM/IRA
SUBJECT: Weekly Team Meeting

ATTENDANCE:

Andy Ledford, EG&G
Bruce Troutman, EG&G
Steve Howard, SAIC/DOE
Harlen Ainscough, CDPHE
Arturo Duran, EPA
Phil Nixon
Pete Holland
J.P. O'Brien
Rich Stegen

DISTRIBUTION:

Briand Wu, DOE
Scott Surovchak, DOE
Eileen Jemison, EG&G
Steve Keith, EG&G
M. Matthews, EG&G,(2)
John Haasbeek, ERM
Rick Wilkinson
Central Files (9.1.5.3)

1. Ratification of Previous Meeting Minutes

The meeting minutes from the April 17, 1995 team meeting were ratified with no substantial comments.

2. Characterization of SEP 207-C

Bruce Troutman presented a modification to the SEP 207-C drilling strategy. Mr. Troutman stated that EG&G had intended to drill 3 vertical boreholes in SEP 207-C. However, the strategy had changed due to the fact that the SEP had not been decontaminated in a manner similar to the other SEPs. Therefore, there are alpha contamination readings of over 1000 disintegrations per minute in the SEP 207-C. A modification to the vertical drilling strategy is proposed.

EG&G proposed to drill 2 inclined boreholes from the north of SEP 207-C without entering the SEP. The strategy will be modified for the following reasons:

1. There are more restrictive health and safety requirements for SEP 207-C than for the other SEPs and the potential for worker exposure is higher.
2. It will be difficult to place the drill rig into SEP 207-C.
3. There is a high potential of contaminating the drill rig beyond a level that can be decontaminated. (The rig would therefore have to be purchased by DOE)

Mr. Troutman asked for CDPHE/EPA concurrence on drilling 2 inclined boreholes at an approximate angle of 12°. The boreholes would penetrate 1 foot of vertical depth per each 5 feet of lateral penetration. Samples would therefore be collected at 5 foot intervals so that a 1 foot vertical profile could be established. Mr. Troutman indicated that one of every 4 collected samples would be analyzed initially to screen the contamination profile and to reduce analytical costs. Mr. Troutman stated that this methodology would provide a good vertical profile as well as a horizontal profile, (something vertical boreholes would not provide). Harlen Ainscough indicated that this inclined approach would not collect samples located just below the SEP base where the majority of the contaminants would likely be detected. Phil Nixon indicated that Parsons ES assumed that the first few feet from beneath SEP 207-C would be removed.

Mr. Nixon stated that the level of contamination beneath the SEPs was not likely to be any higher than the sludge/pondcrete concentrations that have been demonstrated to be protective of human health and the environment. Harlen Ainscough stated that the CDPHE wanted to be sure that the contamination levels beneath SEP 207-C were appropriate for placement beneath the engineered cover.

Arturo Duran specified that the vertical profile was important to assess whether excavation needed to be as deep as the mean seasonal high water table elevation to verify clean closure. Harlen Ainscough indicated that it was probably safe to assume that the SEP 207-C pond soils had to be excavated to the mean seasonal high water table elevation. The design is based on excavating to this depth. The team agreed that the design should assume excavation to the mean seasonal high water table elevation. Steve Howard indicated that the vertical profile was no longer necessary based on this assumption.

The team agreed that boreholes would not be necessary and the CDPHE goals could adequately be met by hand angering through the first 2-5 feet of SEP 207-C. The team agreed to pursue this option. It was agreed that liner and soil samples should be collected and analyzed. A Document Modification Request (DMR) will need to be prepared for the Phase I RFI/RI Work Plan. Three sample locations will be sufficient.

3. Impacts Associated with the QAT Recommendation

Andy Ledford stated that the QAT has written a recommendation to modify the OU4 project to address only the soil materials, and that the liner, sludges, and pondcrete should be addressed by a sitewide Corrective Actions Management Unit or a RCRA Subtitle C landfill. Mr. Ledford questioned whether the OU4 working group needed to address this recommendation. Arturo Duran indicated that he did not believe that the working team had been chartered to analyze this alternative. Steve Howard indicated that the DOE had not stopped work on the current baseline. Harlen Ainscough stated that the CDPHE did not intend to disrupt the OU4 project when they issued a letter to the DOE recommending that DOE locate an appropriate site for a centralized onsite final waste repository.

4. Status of Permit Modification

Andy Ledford asked Harlen Ainscough if the CDPHE had received the information that would help him prepare the permit modification. Mr. Ainscough responded that the conduit for the flow of information was open, and he was preparing a list of information that would be helpful.

5. Calculation and Utilization of New COCs for Post-Closure Monitoring

Andy Ledford suggested that the COCs for OU4 be re-calculated via the new PPRG procedures for the purpose of re-establishing the COC list for post-closure monitoring. This would reduce post-closure care costs. The team agreed that this could be appropriate and beneficial. Steve Howard suggested that initially all COCs be analyzed for to establish a baseline, and then indicator parameters be analyzed after that to provide a sense if conditions were changing beneath the engineered cover. The full list of COCs will be analyzed one quarter each year to confirm the baseline. The CDPHE and EPA were willing to consider this approach. The topic will be discussed in detail at the next meeting.

6. Pond Sludge Processing Unit CDR

Andy Ledford stated that the Pond Sludge Processing Unit Conceptual Design Report (CDR) was nearly completed and would soon be available. Harlen Ainscough said that the document might be useful for preparing the permit modification. Steve Howard informed Mr. Ainscough that the CDR had sufficient detail for permitting uses.

7. Responsiveness Summary Review

The team provided comments on the approach that was being taken for the Responsiveness Summary.

Steve Howard proposed that the introduction be modified to include a statement indicating that the Rocky Mountain Peace Center took an initiative to solicit comments on the proposed IM/IRA. It was agreed that a factual (non-accusing) statement could be made, but that tallying the comments that resulted from the initiative was not appropriate.

Harlen Ainscough questioned whether an EIS would be required in light of the fact that many public commentators requested one. The DOE/EG&G community relations group will brief Mr. Silverman on the EIS issue. It was agreed that the response to the EIS comment would focus on the fact that an EA was performed and is expected to receive a FONSI (Finding of No Significant Impact).

Harlen Ainscough requested that the public involvement comment be reviewed to include additional facts such as the CAB, TRG, RFLII, and Resources Trustees review of the Draft IM/IRA-EA Decision Document. Harlen specified that the response should be more direct.

It was agreed that the response should indicate that the closure in-place alternative had been announced to the public March of 1994 and no public comments were received.

Harlen Ainscough suggested that the DOE credibility response be updated to indicate that the proposed IM/IRA is within the bounds of the regulations.

Steve Howard suggested that the need for a "state-of-the-art closure" and a "national Solution" should be separate issues for a specific response.

Steve Howard recommended that the Brown & Root leach testing be mentioned as a supplement to the modeling demonstration of protectiveness to human health and the environment.

Steve Howard indicated that the sludge/pondcrete treatment waste acceptance criteria should be mentioned because commentators on sludge/pondcrete do not understand how these materials are being dispositioned.

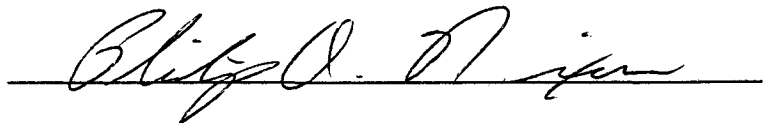
Steve Howard suggested that the responsiveness summary specify that the closure system could be removed without difficulty if there is a failure which impacts the system's ability to be protective to human health and the environment.

Steve Howard stated that a 90 ft x 270 ft Butler building holds 5200 cubic yards of packaged waste at a cost of from 1 to 3 million dollars. Approximately 20 acres of area would be required for the construction of storage buildings. The cost of the buildings alone is anticipated to be 100 million dollars without packaging, transportation, and maintenance costs.

Harlen Ainscough requested that the responses use the term "remediation" as opposed to clean-up.

Harlen Ainscough suggested that the comment responses claim the Interagency Agreement as the comprehensive plan for RFETS remediation.

Mr. Ainscough indicated that Part V of the IM/IRA-EA Decision Document is considered to be the post-closure plan and that the corrective actions management unit (CAMU) regulation (264-552) requires that the post-closure care permit be submitted with the request for the CAMU. Therefore, Part V of the IM/IRA-EA Decision Document may need to be expanded into the permit.

A handwritten signature in cursive script, reading "Philip A. Nixon", is written over a horizontal line.

Philip A. Nixon, Project Manager
OU4 Solar Ponds IM/IRA